

Application No. 10/092,288
Amendment dated December 5, 2006
After Final Office Action of July 28, 2006

(Formerly 13212.111)

Docket No.: 013212.0147C1US

REMARKS

Claims 1 – 44 are pending in this application.

In a Final Office Action mailed 28 July 2006, claims 1 – 44 have been rejected under 35 USC 103(a) as being unpatentable over Head, III (US Patent No. 6,076,652, hereinafter "Head"), in view of Pulliam et al. (US Patent No. 6,609,108, hereinafter "Pulliam"). Applicant has reviewed the cited references and the Examiner's stated grounds of rejection. Applicant has cancelled claims 1-15, 18-20, 31-32 and amended claims 16, 21, 30, 33-36, 43-44. The above amendments to the claims and the following arguments in support of patentability are presented in this response.

The Head Patent teaches an automated assembly line that is computer controlled and operated. More particularly, the Head automated assembly line relates to methods for the real time asynchronous operation of a computer controlled and operated automated assembly line for the production of a standard product. Each of the multiple machines in the Head assembly line is programmed to perform a specific function in the predefined process for producing the standard product. There is no hint of product customization or the ability of customers to access this system to uniquely define a product.

The Pulliam Patent teaches an online communication schema for communicating online vehicle orders is provided. The communication schema includes a customer request message, which includes an order message having order information, contact information and vehicle configuration. The order message includes a fleet order message, a retail order message, and a tagged order message. The communication schema further includes a lead message having lead information, contact information, vehicle configuration, and dealer information. The communication schema further includes an order confirmation message.

In contrast, Applicant's on-demand fulfillment system provides a user interface to enable customers to select from a number of available social expression products, then customize one or more of the social expression products that they select to match their unique needs. These social expression products are therefore customized to match the particular social expression needs of each customer.

In addition, the stock used in the manufacturing process is printable media which is transported to each of the successive manufacturing stations where a social expression manufacturing module performs a finish process on the printable media. Applicant's system must capture the piece of printable media, register it into place and then maintain control of the position of the printable media with respect to each successive social expression manufacturing module

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through the use of a self-adjusting transport element. Thus, Applicant's system begins with a base unit of paper and decorates it with ink, foil and changes the form with emboss. In addition, the product is printed with text and image data selected by the customer. In contrast, the assembly of a car is done through already prefabricated pieces being consolidated into a single product where the assembly is a combination of pre-determined parts that are designed to go together - like a jigsaw puzzle. In contrast, Applicant's system starts with the single sheet of printable media and decorates it. For greeting card assembly, the same piece of card stock could be transformed into a variety of finished cards, each looking different. In the case of a customer defined social expression card being the customer-selected product, the printable stock may be the only common trait of the individual cards. In addition, paper is hydrophobic or water receptive and the dimensional instability of paper makes the registration process very difficult as the paper receives the various decorative processes. "Hard" materials such as metal, plastic, and rubber do not have these issues and thereby do not require the rigor of constant adjustment of registration. In Applicant's system, this problem is addressed by the transport element which automatically and dynamically adjusts the position of the paper with respect to each manufacturing module. The registration datum is the previous decorative process, not the base paper stock, i.e. the litho print and therefore tends to a digital reading to that image. For automobiles, the registration datum is to a rigid member of the design assembly and there is no dimensional instability to deal with.

Applicant has amended the independent claims 1, 16, 30 to direct the claims to the field of social expression cards and also to reflect this ability to dynamically adjust the position of the paper with respect to each manufacturing module. This ability to dynamically adjust the position of a single piece of stock is neither shown nor suggested by the cited Head Patent nor the Pulliam Patent. Applicant therefore believes that claims 16-17, 21-30, 33-44 are now allowable under 35 USC 103(a) over the cited Head Patent in view of the Pulliam Patent.

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In view of the above amendments and remarks, Applicant believes the pending application is in condition for allowance. Applicant believes no fee is due with this response. However, if a fee is due, please charge our Deposit Account No. 50-1848, under Order No. 013212.0147C1US from which the undersigned is authorized to draw.

Respectfully submitted,
PATTON BOGGS LLP

Dated: 5 DECEMBER 2006

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